



"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

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December 8, 2023

Honorable Sarah Netburn
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: In Re Terrorist Attacks on September 11, 2011, 1:03-md-01570 (GBD)(SN)
Halvish, et al. v. bin Laden, et al., 1:03-cv-09848 (GBD)(SN)

Dear Judge Netburn:

As a follow up to the teleconference held on November 3, 2023, we are writing to inform the Court that the law firms of Motley Rice, Kreindler & Kreindler, Anderson Kill and Speiser Krause have resolved all outstanding issues for their firms and their clients relating to the Havlish Plaintiff Counsels' Motion for Common Benefit Fund (Mot. For Common Benefit Fund, ECF No. 3235, Renewed Mot. For Common Benefit Fund, ECF No. 4289). A condition of that resolution is the entry of an order consistent with the attached proposed form of order, dismissing the Havlish motions with prejudice as to these four law firms and their clients. If the proposed form of order is acceptable to the Court, the parties respectfully request that the order be entered by Judge Daniels.

The settling law firms represent more than 90% of the September 11th claimants who have recovered funds as a result of default judgments entered against the Islamic Republic of Iran. The parties respectfully request that the mediation currently set for December 19, 2023 before Magistrate Judge Parker still proceed so that the remaining non-settling firms might have the opportunity to avail themselves of the resolution process.

The parties wish to thank the Court for allowing the parties to meet and confer in order to explore the possibility of resolution.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Donald A. Migliori', is written in a cursive style.

Donald A. Migliori